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Federal Communications Commission
Office of Secretary

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Via Hand Delivery

Office of the Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

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Dear Sir:

Transmitted herewith by Geotek Communications, Inc., is an original and four (4) copies of Comments filed in response to the Petition for Rule Making filed by American Mobile Telecommunications Association, Inc. in RM-8887 and PR Docket No. 93-144.

If any questions should arise related to this filing, please contact the undersigned at telephone number (201) 930-9305.

Sincerely yours,

Susan H.R. Jones

cc: International Transcription Service, Inc. (*via* overnight courier)
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Legal Branch
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Room 7130
Washington, D.C. 20554

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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Federal Communications Commission
Office of Secretary

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| In the Matter of |) | |
| |) | |
| Geographic Partitioning |) | RM-8887 |
| and Spectrum Disaggregation |) | PR Docket No. 93-144 |
| by 900 MHz Specialized Mobile Radio |) | |
| Service Major Trading Area Licensees |) | |

Comments

Geotek Communications, Inc. and its wholly-owned subsidiaries (together, "Geotek"), pursuant to Section 1.405 of the rules and regulations of the Federal Communications Commission ("FCC" or "Commission"), 47 C.F.R. § 1.405, hereby files these comments in support of the Petition for Rule Making filed by American Mobile Telecommunications Association, Inc. ("AMTA"), entitled "In the Matter of Geographic Partitioning and Spectrum Disaggregation by 900 MHz Specialized Mobile Radio Service Major Trading Area Licensees," RM-8887 (the "Petition").¹

AMTA proposes that the Commission modify its rules to permit geographic partitioning and spectrum disaggregation of the 900 MHz specialized mobile radio ("SMR") major trading area ("MTA") licenses along similar guidelines as those proposed by the FCC for personal communication service ("PCS") licenses. The partitioned or disaggregated portion of the 900 MHz SMR MTA license would be subject to parallel construction requirements as those imposed on the MTA licensee, with a co-terminus expiration date. The partitioned or disaggregated licensee would be responsible for the *pro rata* portion of any outstanding debt due to the FCC on the MTA.

¹ The Petition was placed on Public Notice on October 4, 1996.

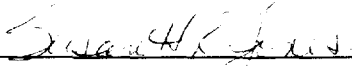
Geotek believes that AMTA's proposal, if adopted by the Commission, will permit 900 MHz SMR service providers greater flexibility with respect to use of resources, encourage broader service offerings, increase the efficiency with which 900 MHz SMR services are available to the public, and expand the future 900 MHz SMR geographic markets to rural or traditionally underserved areas.

Specifically, Geotek is the largest license holder of 900 MHz MTA licenses. In its implementation of its innovative FHMA™ technology, Geotek envisions concentrating initial construction and roll-out efforts in the large urban markets within the regions where Geotek holds MTA licenses. Consequently, the construction of FHMA™ SMR systems in the outlying areas within Geotek's MTAs may be delayed. With geographic partitioning, however, Geotek could enter into strategic relationships with third parties ("Partitioned Licensees") whereby the Partitioned Licensees would construct and implement the FHMA™ SMR network in areas where Geotek is not immediately scheduled to do so. In this way, geographic partitioning permits a faster delivery of innovative and spectrally-efficient wireless technology to a broader segment of the public.

Such a result, as AMTA suggests, improves and expands the 900 MHz SMR service and thereby promotes the public interest. Therefor, for the reasons stated in these Comments, Geotek supports AMTA's Petition and urges the Commission to act expeditiously by granting the proposals contained therein.

Respectfully submitted,

GEOTEK COMMUNICATIONS, INC.

By: 
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Dated: October 21, 1996